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6 Attorney for Robert Guy Russell  
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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12  
13 v.  
14 ROBERT GUY RUSSELL,  
15 Defendant.

Case No. 2:20-cr-00059-APG-DJA  
**STIPULATION TO CONTINUE  
SENTENCING**  
(Seventh Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,  
17 Acting United States Attorney, and Simon F. Kung, Assistant United States Attorney, counsel  
18 for the United States of America, and Rene L. Valladares, Federal Public Defender, and Brian  
19 Pugh, Assistant Federal Public Defender, counsel for Robert Guy Russell, that the Sentencing  
20 Hearing currently scheduled on April 19, 2022 at 2:30 p.m., be vacated and continued to a date  
21 and time convenient to the Court, but no sooner than thirty (30) days.

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1 This Stipulation is entered into for the following reasons:

- 2 1. The parties require additional time to prepare for the sentencing hearing,  
3 including investigating additional facts including facts related to issues raised  
4 at the February 8, 2022, motion hearing before this Court.
- 5 2. Defendant is not incarcerated and does not object to a continuance.
- 6 3. This continuance is not sought for the purposes of delay.
- 7 4. The parties agree to the continuance.

8 This is the seventh request for continuance filed herein.

9 DATED this 12<sup>th</sup> day of April 2022

10 RENE L. VALLADARES  
11 Federal Public Defender

CHRISTOPHER CHIOU  
Acting United States Attorney

12 By /s/ Brian Pugh

By /s/ Simon F. Kung

13 BRIAN PUGH  
14 Assistant Federal Public Defender

SIMON F. KUNG  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ROBERT GUY RUSSELL,

7 Defendant.  
8

Case No. 2:20-cr-00059-APG-DJA

**ORDER**

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10 Based on the Stipulation of counsel and good cause appearing,  
11 IT IS THEREFORE ORDERED that the Sentencing Hearing currently scheduled on April  
12 19, 2022 at the hour of 2:30 p.m., be vacated and continued to June 9, 2022, at the hour of  
13 10:00 a.m. in Courtroom 6C.

14 DATED this 13th day of April 2022.

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17 UNITED STATES DISTRICT JUDGE  
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